Marian Olsen

To: Grisell Diaz-Cotto/R2/USEPA/US@EPA

08/02/01 11:56 AM

cc: Diana Cutt/R2/USEPA/US@EPA

Subject: Re: Sampling Plan for Diamond Head Oil Refinery

Hi Grisell.

As a follow-up to our discussion today, following are my recommendations regarding sampling at the Diamond-Head Oil Refinery in New Jersey. Essentially, I contacted the Statistical Support Branch at EPA's National Exposure Research Laboratory and provided them information regarding the site. They recommended (see memo that will be sent today) that a total of 65 surface soil and 35 subsurface soil samples be collected for the site. They also recommended a 100' x 100' sampling grid for the process. I agree with their recommendations but am concerned that this sampling approach will not address the landfill delineation process. In looking at the maps, it is unclear whether we can clearly define the extent of the landfill and I would recommend additional sampling for this purpose. It is difficult to identify a specific number of samples since we lack information about the general size of the landfill. Therefore, I would recommend discussing this issue with the contractor to determine how many of these samples may be necessary.

I understand that Diana is providing information regarding the number of wells for the site. For risk assessment purposes, we need a minimum of 10 samples to calculate the 95% UCL but would prefer a larger number for representativeness.

Concerning PCB sampling, I would recommend that we evaluate PCBs based on Aroclors as a first step and then consider sampling for congeners. The congener samples are very expensive and we may want to evaluate the Aroclor data before conducting congener specific analysis.

Please let me know if you need any additional information.

Marian